

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HERIBERTO COLON-TORRES,  
*Plaintiff,*

v.

Civil Action No. 5:24-cv-01745-JLS

OCTAVIO SERRANO,  
ZEISLOFT TRUCKING, LLC d/b/a  
ZEISLOFT LOGISTICS a/k/a ZEISLOFT  
TRUCKING OF WEST DEPTFORD a/k/a  
CHARLES D. ZEISLOFT TRUCKING,  
ZEISLOFT VENTURES,  
ROCK PRODUCTS, INC.,  
SAINT NICK LOGISTICS, LLC,  
DAT SOLUTIONS, LLC,  
JOHN DOE, and ABC COMPANY,  
*Defendants.*

**SUPPLEMENTAL DECLARATION OF JOSEPH DOYLE**

I, Joseph Doyle, declare and state as follows:

1. I am the General Counsel for DAT Solutions, LLC (“DAT Solutions”). I have personal knowledge of the facts set forth in this Declaration, and if called upon to testify thereto, I could and would competently do so under oath.
2. DAT Solutions, LLC is single-member limited liability company formed in Delaware in 2000.
3. From 2022 through present, DAT CNUS, Inc. (“DAT CNUS”) has been the only member of DAT Solutions, LLC.
4. DAT CNUS is a business corporation that is incorporated in Delaware.
5. DAT CNUS’s corporate headquarters is located at 5050 S. Syracuse Street in Denver, Colorado.

6. DAT CNUS also has corporate offices located in the states of Oregon and Colorado. However, neither DAT CNUS nor DAT Solutions has a physical office located in Pennsylvania.

7. The plurality of DAT CNUS's officers and senior management team are based out of Oregon or Colorado, or work remotely from other states including California, Florida, Washington, and Ohio.

8. None of DAT CNUS's officers or senior managers reside in, or work out of, Pennsylvania.

9. When the members of DAT CNUS's senior management team who are responsible for directing, controlling, and coordinating the corporation's business activities meet in person, they do so at DAT CNUS's headquarters in Denver, Colorado.

10. The majority of DAT CNUS's staff members who are responsible for DAT CNUS's business operations are based in Colorado and, to a lesser extent, Oregon.

11. In 2021, DAT CNUS registered as a foreign business corporation with the Pennsylvania Department of State.

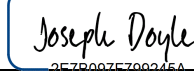
12. Since DAT CNUS does not maintain a physical address in Pennsylvania, it has listed United Agency Group, Inc. as its Commercial Registered Officer Provider in its filings with the Pennsylvania Department of State.

13. Neither DAT CNUS nor DAT Solutions have any employees who work at 1001 State Street in Erie, Pennsylvania.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 6/11/2024

DocuSigned by:

A blue ink signature of Joseph Doyle is written over a blue DocuSign signature line.

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Joseph Doyle  
General Counsel, DAT Solutions, LLC